

EXHIBIT A

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

4 HODELL-NATCO) Case No. 1:08 CV 2755
INDUSTRIES, INC.,)
5 Plaintiff,) Judge: Lesley Wells
) Magistrate Judge:
6 vs.) Greg White
7 SAP AMERICA, INC., et) VOLUME I
al.,)
8 Defendants.)

THE VIDEOCONFERENCE DEPOSITION OF OTTO REIDL

DATE: Tuesday, February 7, 2012

TIME: 9:57 a.m.

PLACE: Reminger & Reminger
1400 Midland Building
101 Prospect Avenue, West
Cleveland, Ohio 44115

NEXTGEN REPORTING

Registered Professional Reporters

Otto Reidl - Vol. 1 - February 7, 2012

236

1 the license agreement in 2005, was it your
2 personal belief that you had any sort of
3 special relationship with SAP, either SAP
4 America, or SAP AG, or did you feel that you
5 were just dealing with them as a business
6 customer, or -- not the right word -- let me
7 ask the question again.

8 At the time that you signed the license
9 agreement in December of 2005, did Hodell
10 believe that it had any special relationship
11 with SAP America, or SAP AG, such that it was
12 in a position of trust or confidence with SAP?

13 MR. LAMBERT: Objection.

14 THE WITNESS: I don't believe it was a
15 special relationship. I believe a company of
16 SAP's stature requires an up and up
17 relationship with all their clients.

18 BY MR. STAR:

19 Q. So you'd agree that when you
20 signed the license agreement, you had nothing
21 more than a business to business, or arm's
22 length relationship between Hodell and SAP,
23 correct?

24 A. Correct.

25 Q. Let's go off the record for a

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

HODELL-NATCO) Case No. 1:08 CV 2755
INDUSTRIES, INC.,)
Plaintiff,) Judge: Lesley Wells
vs.) Magistrate Judge:
) Greg White
SAP AMERICA, INC., et)
al.,)
Defendants.) VOLUME II

THE CONTINUED VIDEOCONFERENCE DEPOSITION OF OTTO REIDL

13 DATE: Wednesday, February 8, 2012

14 | TIME: 9:41 a.m.

15 PLACE: Reminger

23 **NEXTGEN
REPORTING**

25 Registered Professional Reporters

Otto Reidl - Vol. 2 - February 8, 2012

306

1 direct conversations with SAP, other than
2 visits by Mr. Sotnick, were with Kevin.

3 BY MR. STAR:

4 Q. So you have no personal
5 recollection or --

6 A. I don't recall any specific
7 conversation where that topic was discussed.

8 Q. Did you personally ever consider,
9 you personally, ever consider switching from
10 the Business One platform to the All-in-One
11 platform?

12 A. Did I consider it?

13 Q. Yes, sir.

14 A. Think about it, meaning I was
15 willing to do it, or reviewed the possibility?

16 Q. Well, you can use the word
17 considered as you feel -- as you deem fit.

18 The question stands. The word has its
19 ordinary meaning.

20 A. At that point, I had zero
21 confidence in SAP at this date.

22 Q. As of April of 2007?

23 A. (Witness nods head.)

24 Q. Yes?

25 A. Correct.